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To Whom It May Concern:

FAA-2002-12261-38

02 JUL 17 PM 10:57  
DEPT. OF TRANSPORTATION

Re: Docket Number 12261 (DRVSM NPRM)

I am the Director of Flight Operations for a small charter company in Wisconsin. I do NOT support the implementation of RVSM in the Domestic U.S. I also do apologize if I may not have all the details supporting my case precisely accurate.

The number one reason I am against DRVSM is the cost to us small operators. My company owns one aircraft affected by this plan, a Lear 35. The current cost alone to upgrade our aircraft is nearly \$200,000. That's roughly 10% of the value of our aircraft, a small fortune. Here are the choices I see.

1. I can elect not to upgrade and save the money I have set aside for the anticipated required, expensive TCAS II upgrade, and ground proximity requirement due by March of 2005.
  - If I do this I wouldn't be allowed to fly between FL 290 and 410. Due to the rate of fuel consumption and added engine maintenance below FL 290, it is not economical or practical to operate there.
  - The value of my aircraft would depreciate such because of not having DRVSM installed and the airspace requiring it, economic failure of my company could result.
2. I can elect to upgrade with the above items including DRVSM, TCAS, Ground Prox, and spend nearly \$300,000 in just over a year. That cost would take me well over two decades to earn back before collecting a profit.
  - Larger companies such as the airlines make and loose that amount exponentially in a day. They can afford to install this type of costly equipment in their aircraft. To them, this costly upgrade is a small drop in a bucket-full of water.
  - What about downtime? I haven't addressed that. If my aircraft is down for maintenance for approximately 5 or 6 weeks, I loose that revenue generating period in addition to the cost for upgrade. My company as well as the customer suffers in the end.

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Some other topics for consideration before requiring DRVSM are as follows:

- If DRVSM is approved and required, there is always that chance that the aircraft flying in my adjacent altitude may not have RVSM installed (basically illegally operating there), thus creating a hazard to both aircraft and it's occupants, as well as populations on the ground.
- Let's look at safety, the German and Russian collision that recently occurred in Switzerland. RVSM was in effect there. What happened? How many lives will we loose before the DOT thinks this isn't a good idea?
- We already have overcrowding at our major airline hubs, this DRVSM will increase that overcrowding and delay programs will increase. Think about it. The same number of operations at busy airports with more aircraft flowing in the airspace getting to those hubs. Somewhere there has to be delays, or a system to manage that increase of traffic.
- How accurate will the FAA ATC system be? Will this 1960's equipment also be upgraded?
- I don't understand how the government can require such a costly upgrade for ALL aircraft at those upper altitudes. What if every vehicle on the road required a modification that would cost 2,000 to 3,000 per vehicle. How do you think the American public would react to that requirement? More so, how could lower income Americans pay for that?
- Can some payment help come from the government, or large airline carriers who are in favor of this upgrade?
- Will the few companies performing this maintenance be able to keep up with the demand? Will they price gouge, or will the government limit the costs involved?

In conclusion, I'd like to restate that I am AGAINST development of the DRVSM, at least at the owner / operator's entire cost. Smaller companies cannot afford the installation of RVSM equipment and certification, and downtime created by it. The economy is already hurting stemming from September 11<sup>th</sup>. I think this would only aggravate our already fragile economy.

The airspace congestion is a second major factor. My theory is, "if it's not broke, don't fix it". The airspace works fine now, with minimal delays in good weather conditions. I think adding RVSM to the United States airspace would be detrimental to air carrier hubs, and thousands of passengers it supports.

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Thank you for your time and careful considerations before electing the outcome of all our comments on the DRVSM subject. I feel this really needs to be studied again, taking into account the economic impact to all, including small businesses.

Sincerely,



Timothy G. Haas

Director of Flight Operations

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